



February 15, 2016  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: PriorityONE Telecommunications, Inc.**  
**Filer ID: 821516**  
**CY 2015 Annual CPNI Certification**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2015 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009(e) submitted on behalf of PriorityONE Telecommunications, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3019 or via email to [dgainor@tminc.com](mailto:dgainor@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Deborah Gainor

Deborah Gainor  
Consultant to PriorityONE Telecommunications, Inc.

cc: K. Mutch - PriorityONE  
file: PriorityONE- FCC - CPNI  
tms: FCx1601

Enclosures  
DG/sp

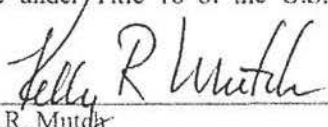
ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for: Calendar Year 2015  
Name of Company covered by this certification: PriorityONE Telecommunications, Inc.  
Form 499 Filer ID: 821516  
Name of Signatory: Kelly R. Mutch  
Title of Signatory: President

I, Kelly R. Mutch, certify and state that:

1. I am President of PriorityONE Telecommunications, Inc. ("Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The Company has not taken any actions (i.e., proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
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Kelly R. Mutch  
President

Feb. 9, 2016  
\_\_\_\_\_  
Date

Exhibit A  
Compliance Statement and Operating Procedures

**PriorityONE Telecommunications, Inc.**

Calendar Year 2015

## **CPNI Compliance Statement and Operating Procedures of PriorityONE Telecommunications, Inc.**

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996; Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) ("EPIC CPNI Order"),<sup>1</sup> Kelly R. Mutch, President, of PriorityONE Telecommunications, Inc. and affiliated entities makes the following statement:

PriorityONE Telecommunications, Inc. has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules regarding the use, disclosure, and access to Section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that PriorityONE Telecommunications, Inc. is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize PriorityONE Telecommunications, Inc.'s policies and procedures designed to safeguard CPNI.

PriorityONE Telecommunications, Inc. has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. PriorityONE Telecommunications, Inc. is engaged in training their personnel as to when they are and are not authorized to use CPNI, and PriorityONE Telecommunications, Inc. has an express disciplinary process in place.

PriorityONE Telecommunications, Inc. uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. PriorityONE Telecommunications, Inc. does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service. PriorityONE Telecommunications, Inc. has established a supervisory review process regarding its compliance with CPNI rules regarding outbound marketing situations and maintains records for one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

PriorityONE Telecommunications, Inc. has established procedures to verify an incoming caller's identity. PriorityONE Telecommunications, Inc. trains its personnel in both the use of CPNI and protection of its confidentiality. These procedures are detailed in PriorityONE Telecommunications, Inc.'s CPNI Manual. PriorityONE Telecommunications, Inc. also limits the number of employees that have access to customer information and call data.

PriorityONE Telecommunications, Inc. has implemented measures to discover and to protect against unauthorized attempts to access CPNI. PriorityONE Telecommunications, Inc. also has implemented procedures pursuant to which it can track breaches of CPNI and, given such an event, will notify the United States Secret Service and the Federal Bureau of Investigation in accordance with the FCC's rules.

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<sup>1</sup> 47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."

PriorityONE Telecommunications, Inc. will track customer complaints regarding CPNI, notify its customers in accordance with the FCC's rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

PriorityONE Telecommunications, Inc. has not taken any actions (proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Pretexters have not attempted to access PriorityONE Telecommunications, Inc.'s CPNI. There have been no customer complaints received in the past year concerning the unauthorized release of CPNI.

PriorityONE Telecommunications, Inc. annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.